

THE LAW OFFICE OF

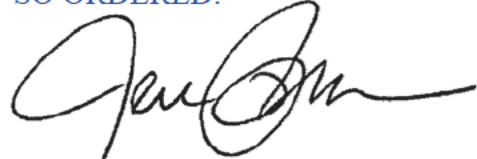
ELISA HYMAN, P.C.

April 29, 2020

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. Plaintiffs are granted leave to file their opposition brief (not to exceed 50 pages) **by May 26, 2020**; any reply shall be filed **by June 11, 2020**. The Clerk of Court is directed to terminate ECF No. 65. SO ORDERED.



Re: N.J. and G.J. v. N.Y.C. Dep't of Educ., et al
18-cv-06173 (JMF)

April 29, 2020

Dear Judge Furman:

I represent Plaintiffs in the above-referenced action and am writing to request an extension of time to file Plaintiffs' Opposition to Defendants' motion for partial summary judgment, as well as an enlargement of Your Honor's page limit rules.

After several extensions, Defendants filed their motion for partial summary judgment on March 20, 2020. Plaintiffs' opposition is currently due May 5, 2020. In light of various and numerous issues due to COVID-19, as well as the volume of Defendants' motion and the related administrative records, additional time is needed to prepare Plaintiffs' opposition. Plaintiffs respectfully request a 3-week extension of time to file their opposition, which would now be due May 26, 2020. With a corresponding extension, Defendants' reply would then be due June 11, 2020.¹

Additionally, Plaintiffs respectfully request permission to exceed the 25-page limitation in Your Honor's Individual Rules with respect to memorandum of law. Defendants were granted a page-limit enlargement and filed a 35-page memorandum. Because of the number of factual issues in dispute and length of time at issue in this motion (at least 8 years), Plaintiffs respectfully request permission to file a memorandum of law no more than 50 pages in length.

I have spoken with Defendants' counsel, Lana Koroleva, and she consents to the extension of time and page-limit enlargement.

¹ Defendants had agreed to allow G.J. to start tutoring services using some of the compensatory education that had already been ordered, but due to COVID-19 issues those have not started yet.

Thank you for Your Honor's consideration of these requests.

Sincerely,

/s/ Elisa Hyman

Elisa Hyman
Counsel for the Plaintiffs

cc: Lana Koroleva, Assistant Corporation Counsel